

EXHIBIT E

1 Q. Uh-huh.

2 A. And I did. I called Jeremy.

3 Q. Is that all the two of you discussed?

4 A. I believe so.

5 Q. You can't recall anything?

6 A. I can't recall anything else.

7 Q. Yvette had no reaction to you telling
8 her that someone said that they were out to get
9 her?

10 MS. MALLOY: Objection.

11 A. Obviously, she was concerned.

12 Q. Well, how did she express her concern?

13 A. I don't have an answer for that. I
14 mean I could hear that she was concerned.

15 Q. How could you hear? What were you
16 hearing?

17 A. Just -- I don't know how to describe,
18 you know, an emotion in a voice. I don't know
19 how to describe that.

20 Q. Uh-huh, okay. Did she indicate that
21 she was going to call Ideal also? Did she make
22 any reference to that?

23 A. I don't recall that.

24 Q. She just directed you to?

1 question.)

2 MS. MALLOY: Do you have my objection
3 on there to the form of the question and the
4 fact that it's argumentative?

5 REPORTER: Yes.

6 MS. MALLOY: Okay, I just want to make
7 sure.

8 MS. CLEMONS: Mine too, because it
9 assumes a fact not in evidence.

10 MR. FLETCHER: Go ahead.

11 A. I called Jeremy based on the
12 information given to me by Carlos.

13 Q. But you hadn't even asked Carlos for
14 the tape before calling Jeremy?

15 A. No, I did not.

16 Q. All right, did you get ahold of
17 Mr. Leaman?

18 A. Yes.

19 Q. All right, what did you tell him?

20 A. I told him that I have been informed
21 that Will Hanson was recording in our store and
22 it's a violation of Lowe's company policies to
23 record for any reason in our store. I don't
24 recall verbatim what Jeremy may have said at that

1 time.

2 Q. Well, tell me in a general way what
3 you believe he said.

4 A. Okay.

5 MS. MALLOY: Don't guess, please. You
6 were instructed about depositions. I am
7 going to ask you not to guess.

8 BY MR. FLETCHER:

9 Q. I want your best recollection. It
10 does not have to be verbatim, but it does have to
11 be complete. Go ahead.

12 A. Jeremy told me he would take care of
13 it, and he asked me if Will could work that day.
14 I told him at that time that I would prefer not.

15 Q. Did you take it to mean that he wanted
16 to know if Will could finish up that day's work?

17 A. Um, as far as I presumed that would
18 mean that, but I don't know if that's what he was
19 implying.

20 Q. Well, were you telling him, when you
21 said "I prefer not," were you expecting that he
22 would remove him from the premises then and
23 there?

24 A. Yes.